

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JONATHAN GOMEZ NORIEGA,

Plaintiff,

v.

THE CITY OF JERSEY CITY; MAYOR
STEVEN FULOP (individually and in his official
capacity as Mayor of the City of Jersey City);
KIMBERLY WALLACE-SCALCIONE
(individually and in her official capacity as Press
Secretary/Spokesperson for the City of Jersey
City); JOHN MINELLA (individually and in his
official capacity as Mayor Fulop's Chief of Staff);
JOHN METRO (individually and in his official
capacity as Jersey City Manager); MOBIN
YOUSAF (individually and in her official capacity
as Jersey City Director, Employee Relations &
Workforce Management); JOHN DOE (1-10),

Defendants.

CASE NO: 2:24-CV-10599-WJM-JRA

CIVIL ACTION

**STIPULATION AND [PROPOSED] ORDER ADJOURNING
MOTION DAY FOR DEFENDANTS' MOTION TO DISMISS**

WHEREAS, plaintiff Jonathan Gomez Noriega ("Plaintiff") filed the Complaint in this action on November 20, 2024;

WHEREAS, Plaintiffs served the Complaint on defendants The City of Jersey City, Mayor Steven Fulop, Kimberly Wallace-Scalcione, John Minella, John Metro, and Mobin Yousaf (collectively, "Defendants") on December 18, 2024;

WHEREAS, pursuant to Rule 12(a) of the Federal Rules of Civil Procedure, Defendants' time to respond to the Complaint was originally January 8, 2025;

WHEREAS, on the parties' stipulation dated January 7, 2025, the Court extended Defendants' time to respond to the Complaint to January 31, 2025, by order dated January 8, 2025;

WHEREAS, Defendants moved to dismiss the Complaint on January 31, 2025 (the “Motion to Dismiss”), which motion was noticed for the March 3, 2025, motion day; and

WHEREAS, the parties hereby stipulate and agree to adjourn the Motion to Dismiss to the April 7, 2025, motion day, and extend the deadline for opposition and reply briefs for the same;

WHEREAS, no prior adjournment of the motion day for the Motion to Dismiss has previously been requested;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their respective undersigned counsel, that the motion day for the Motion to Dismiss is adjourned to April 7, 2025, that Plaintiff’s time to oppose Defendants’ Motion to Dismiss is extended up to and including March 24, 2025; and Defendants’ time to file any reply in further support of the motion to dismiss is extended up to and including March 31, 2025.

AGREED AS TO FORM AND SUBSTANCE

Dated: February 18, 2025

SEKAS LAW GROUP, LLC

By: s/ Giancarlo Ghione

Nicholas G. Sekas
Giancarlo Ghione
530 Sylvan Avenue, Suite 201
Englewood Cliffs, New Jersey 07632
(201) 816-1333
nsekas@sekaslaw.com
gghione@sekaslaw.com

*Attorneys for Plaintiff Jonathan Gomez
Noriega*

CALCAGNI & KANEFSKY LLP

By: s/ Paul Kingsbery

Ralph J. Marra, Jr.
Paul Kingsbery
Emily Arezzi
1085 Raymond Blvd. 18th Floor
Newark, New Jersey 07102
(862) 397-1796
rmarra@ck-litigation.com
pkingsbery@ck-litigation.com
earezzi@ck-litigation.com

*Attorneys for Defendants The City of Jersey
City, Mayor Steven Fulop, Kimberly Wallace-
Scalcione, John Minella, John Metro, and
Mobin Yousaf*

SO ORDERED.

Date:

HON. WILLIAM J. MARTINI
UNITED STATES DISTRICT JUDGE